3560 Aug 1003 10/8/14

EPA

United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5	3 I D G 1 3 1 0 0 4 11	12 1 4 0 9 0 2 17	18 C	19 S	20 3

Remarks

21 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 3 5 69	70 4	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
Kooskia National Fish Hatchery - IDG131004 318 Toll Rd. Kooskia, ID 83539	9/2/2014 14:00	12/1/2007
	Exit Time/Date 9/2/2014 16:45	Permit Expiration Date 11/30/2012 Admin. Extended

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers
Kent Hills/Manager/208-926-4272
Kenny Simpson/Tech 3

Other Facility Data (e.g., SIC, NAICS, and other descriptive information)
SIC: 0273 (Animal Aquaculture)
NAISC: 112511 (Finfish Farming & Hatcheries)

Name, Address of Responsible Official/Title/Phone and Fax Number
Kent Hills/Manager/208-926-4272

Contacted: [X] Yes [ ] No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

X	Permit		Self-Monitoring Program		Pretreatment		MS4
X	**Records/Reports**		Compliance Schedule		Pollution Prevention		
X	Facility Site Review		Laboratory		Storm Water		
X	Effluent/Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow		
X	Flow Measurement	X	Sludge Handling/Disposal		Sanitary Sewer Overflow		

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes | SEV Description

RECEIVED
OCT 10 2014
Inspection & Enforcement Management Unit
(IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Mike Piechowski, P.E.	IDEQ State Office / 208-373-0274 / 208-373-0143	9/5/2014
A.J. Maupin, P.E.	IDEQ State Office / 208-373-0167 / 208-373-0576	30-Sep-14

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete

ICIS.
10-31-2014

Copy sent to OCE 10/23/14

Idaho Department of Environmental Quality

AQUACULTURE FACILITY INSPECTION SURVEY

General NPDES Permit Numbers IDG-**130000**
Effective: **December 1, 2007** - November **30, 2012**

PURPOSE OF INSPECTION:	Determination of compliance with NPDES permit and the Clean Water Act.
TYPE OF INSPECTION:	☐ Unannounced ☐X Announced ☐CSI ☐X CEI ☐Recon
DATE(s) OF PREVIOUS NPDES INSPECTIONS:	Date: Unknown Date:
PENDING OR CURRENT ENFORCEMENT ACTIONS: (review NOV and warning letters on file)	N/A
FACILITY NAME:	Kooskia National Fish Hatchery
NPDES PERMIT #	IDG-131004
FACILITY CONTACT:	Name: Kent Hills Phone Number: 208-926-4272
FACILITY SIZE (annual fish production; affects frequency of monitoring requirements in parentheses) Confirm production and monitoring frequency during the inspection.	☐ > 500,000 (monthly) ☐ 100,000 - 500,000 (quarterly) ☐ **< 100,000 (semi-annual)** ☐ Other (explain)
INSPECTOR(s) AND AFFILIATION	Mike Piechowski Idaho Department of Environmental Quality Technical Services – State Office
DATE OF INSPECTION:	Date: 9/2/2014 Arrival Time: 2:00 pm Departure Time: 4:45 pm
Photo of facility sign, if any, and facility	
DATE OF FINAL REPORT	Date: 9/13/2014

ENTRY AND PERMIT CONDITIONS REVIEW

X Present your credentials and provide a business card; explain the purpose of the inspection and how you plan to proceed.

Interviewee Questions	
1. Obtain representative's name, position, and phone number.	Name: Kent Hills Position: Hatchery Manager Phone: 208-926-4272
2. How long has the representative worked for the company?	3.5 years
3. How long has he/she held the position?	3.5 years
4. Other representatives present?	Kenny Simpson
NOI Review: Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI? 5/23/2012	
2. Is the NOI complete and current?	X☐**Yes** ☐No
3. Have any structural changes been made to the facility recently?	☐Yes X☐**No**
4. Any structural changes anticipated? (Plan and Spec review required of IDEQ, if so; see page 47; Part VI.I.2.)	X☐**Yes** – 2 new acclimation ponds planned ☐No
FACILITY LOCATION, ETC: (see NOI)	Address: 318 Toll Road Kooskia, ID 83539 Phone: 208-926-4272 Fax:
OWNER NAME:	US Fish & Wildlife Service
OWNER ADDRESS:	Address: Eastside Federal Building 911 NE 11th Ave Portland, OR 97232 Phone Number: 503-231-2062 Fax: E-mail: richjohnson@fws.gov

OPERATOR NAME:	Nez Perce Fisheries
OPERATOR ADDRESS:	Address: 318 Toll Road Kooskia, ID 83539 Phone Number: 208-926-4272 Fax: E-mail: kenth@nezperce.org
PERMIT TRANSFERS: 1. Is this a new operator?	☐Yes X☐**No**
According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and IDEQ notified in writing of the transfer?	☐Yes ☐X **N/A** ☐No
LOCATION OF FACILITY:	GPS taken at entrance to facility. Latitude: 46.503314 Longitude: 116.329612 Date: Time: Count:

AUTHORIZATION TO DISCHARGE	
1. Did you receive a letter authorizing you to discharge?	X☐**Yes** ☐No
2. "Addressee" on the authorization to discharge letter: 3. Is this correct?	Name: Kent Hills X☐**Yes** ☐No: name_____
4. Do you have a copy of the permit?	X☐**Yes** ☐No
5. Is the facility currently discharging?	X☐**Yes** ☐No

6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)?	X☐**Yes** ☐No
7. If not currently discharging, when do you expect to rear fish again at this facility?	☐**N/A** Date:

PROHIBITED DISCHARGES, Part II.B., Page 29 Review the prohibited discharges 1 and 2 (a-h) with the interviewee. COMPLETE	
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	☐Yes **X☐No**
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	☐Yes X☐**No**
Questions or Comments:	

PROHIBITED PRACTICES, Part II.C., Pages 29-30 1. Review the prohibited practices 1 through 2 with the interviewee. COMPLETE	
2. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	☐Yes X **No**
3. Do you expect to have any difficulty prohibiting such practices at this facility?	☐Yes X☐**No**
Questions or Comments:	

FACILITY MONITORING, Part II.D., (see page 30-33)

Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See page 30, II.D.2.b., for requirement when data are less than MDL.

According to II. D., "The permittee shall monitor discharges from all outfalls authorized under the permit as specified in Tables 12 and 13…" (see pages 30-33) For frequency requirements, see footnote 16 of Table 12, and footnote 29 of Table 13 for OLSBs)

1. When was the last monitoring event?	July 2014
2. Who conducted the monitoring?	Kenny Simpson
3. Is this the person who usually conducts the monitoring?	X☐**Yes** ☐No

3. What is the interval of discrete sampling for the composite sample? (permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	4 ½ hour intervals
4. When sampling raceway discharge, is at least one sample taken during quiescent zone or raceway cleaning?	☐X **Yes** ☐No
If not, why not.	
5 What type of sample are you taking for influent? (permittees with spring influents may elect to take grabs, page 32, footnote 17)	Composite
6. Who fills out the DMRs?	Kent Hills
7. When was the most recent DMR submitted to EPA and IDEQ?	July 2014
8. How and where is flow measured for the raceways? Overflow weir And by whom? Kenny Simpson Is this flow measurement method one of those specified in Appendix E. Part I.A., page 79? ☐X **Yes** ☐No	
9. How is the flow measuring device calibrated? And by whom? Staff gauge	
10. How and where is flow measured for the offline settling basins? And by whom?	Overflow weir. When cleaning, all flows go to settling pond. Kenny Simpson
11. Was net effluent load recorded on the DMR calculated correctly? (check a few DMRs; see Appendix D, page 75 for equations)	X☐**Yes** Note: System uses GW during summer months due to high creek temperatures. ☐No
12. Are you aware of any recent violations of the permit limits? What was the limit that was exceeded?	X☐**Yes** ☐No SS % removal

When was it?	7/2013, 11/2013
13. Are the data reported properly on the DMR?	X☐**Yes** ☐No
14. Are DMR data consistent with analytical results?	X☐**Yes** ☐No

RECEIVING WATER MONITORING, Part II.E., (see pages 33-35)

According to II.C.1., "All permittees with OLSB that discharge directly to receiving water must conduct receiving water monitoring for ammonia, pH, and temperature upstream from the outfall."
And 2., "All facilities using chelated copper compounds or copper sulfate must monitor total recoverable copper and hardness immediately upstream of the outfall at least once in any quarter when these compounds are applied..."

Ask to see the QA plan which will describe where the samples are taken in the receiving stream.

1. If the facility has an OLSB discharging to a receiving stream.... Are you monitoring receiving water for ammonia, pH, and temperature?	X☐**Yes** ☐No
2. Are you monitoring receiving water for copper quarterly when you use it?	**X**☐**Yes** ☐No
3. Are you submitting the results to EPA and IDEQ with the DMRs?	X☐**Yes** ☐No

QUALITY ASSURANCE PLAN, Part II.F., (see page 35) According to II.F. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. Do you have a QA plan?	X☐**Yes** ☐No
2. When did you submit the certification that a plan has been developed?	8/22/2012
According to II.F.3.a) the QA Plan must include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements.	
3. Does the plan include these details?	X☐**Yes** ☐No
If not, what is missing?	
According to II.F.3.a) the QA Plan must include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows.	
4. Does the plan include the flow measuring description?	**X**☐**Yes** ☐No
5. Does the plan describe the method of compositing samples?	X☐**Yes** ☐No
6. If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	X☐**Yes** ☐No
7. If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	☐Yes X☐**N/A**

8. Does the plan include a map(s) of sampling points?	X☐**Yes** ☐No
9. Did you include in your QA plan the quality assurance and control for receiving water monitoring, including the sampling location rationale?	X☐**Yes** ☐No
10. Does the plan include qualifications and trainings of personnel?	☐Yes X☐**No**
11. Does the plan include the laboratory name and telephone number?	X☐**Yes** ☐No
12. Is facility following / using the QA Plan?	**X☐Yes** ☐No
BEST MANAGEMENT PRACTICES PLAN, Part III., (see page 36) According to Part III.C. "the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.	
1. Do you have a BMP plan? If not on site, is it in the possession of staff when they are working on-site?	**X☐Yes** ☐No X☐**Yes** ☐No
2. When did you submit the certification that a plan has been developed?	8/22/2012
The BMP plan must include the following BMPs: **(see page 36)**	
1. Chemical Storage a. ensure proper storage to prevent spills, b. implement procedures for proper containing, cleaning and disposing of spilled material.	X☐**Yes** ☐No ☐Yes ☐No
2. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage, How often?	X☐**Yes** ☐No Annually

b. regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	X☐**Yes** ☐No
3. Training Requirements: a. Train personnel in spill prevention and clean-up and disposal of spilled materials. b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.	**X☐Yes** ☐No **X☐Yes** ☐No
4. Operational Requirements: a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S. b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter. c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable. d. All drugs and pesticides must be used in accordance with applicable label directions (FIFRA or FDA) e. Chelated copper compounds and copper sulfate, when used, must be applied to only one raceway at a time. f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include fish mortalities and other processing solid wastes from aquaculture. g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100. h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed	☐Yes X **N/A** ☐Yes X☐**N/A** **X☐Yes** ☐**N/A** ☐ Yes X☐**N/A** ☐Yes X☐**N/A** X☐**Yes** ☐No **X☐Yes** ☐No X☐**Yes** ☐No
When was the BMP Plan last updated?	2012

AQUACULTURE SPECIFIC REPORTING REQUIREMENTS, Part IV., Page 38	
A. Drug And Other Chemical Use And Reporting Requirements (see pages 38-39)	
1. Do you use drugs, pesticides or other chemicals? Occasional Formalin	X☐**Yes** ☐No
If yes, ask to see the Chemical Log Sheet. **(see Appendix G, page 91)**	
1. Are records being maintained of all applications?	X☐**Yes** ☐No
2. When an INAD or extralabel drug is used for the first time, you are required to report this orally and in writing to EPA and IDEQ. Have you used INADs or plan to use INADs or extralabel drugs? If so,… Have you written to EPA and IDEQ that you have signed up to use an INAD or prescription? (page 88) Have you provided an oral report to EPA and IDEQ of an INAD or prescription use? (page 87) Have you provided a written report to EPA and IDEQ of an INAD or prescription use? (page 89)	☐Yes X☐**N/A** ☐Yes Date:_____ X☐**N/A** ☐Yes Date:_____ X☐**N/A** ☐Yes Date:_____ **X**☐**N/A**
B. Structural Failure (see page 39) Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and IDEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	Confirmed? **X Yes** ☐No
C. Spills of feed, drugs, pesticides or other chemicals (see page 39) Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and IDEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	Confirmed? **X Yes** ☐No

D. Annual Report of Operations (see page 40) Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and IDEQ. (see Appendix H, page 95-96 for form)	Confirmed? **X Yes** ☐No
1. Did you submit the last report as required?	X☐**Yes** ☐No
2. Is the annual report complete? (Check the report against the required elements on pages 95-96.)	X☐**Yes** ☐No
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	X☐**Yes** ☐No
Was the facility able to provide all the required paper documentation requested?	**X☐Yes** ☐No
FACILITY PHYSICAL INSPECTION Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
1. Any excessive feed in the raceways?	☐Yes X☐**No**
2. Any excessive solids stirred up in raceways?	☐Yes X☐**No**
3. Are all the barrier dam boards in place and level?	X☐**Yes** ☐No
4. Any excessive solids built up in quiescent zones?	☐Yes X☐**No**
5. Any excessive solids going over the dam boards.	☐Yes X☐**No**
6. Any fish observed in the quiescent zones?	☐Yes X☐**No**

Photo (s) of raceway(s) conditions above,	See Photo Log
Discharges:	
Photo (s) of raceway(s), tailrace, and/or full-flow settling basin discharges.	See Photo Log
Are there any unreported outfalls? (check observed against NOI)	☐Yes X☐**No**
If so, describe:	
Photo (s) of receiving water(s), particularly documenting any of below:	See Photo Log
1. Any floating solids or visible foam in other than trace amounts?	☐Yes X☐**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	☐Yes X☐**No**
3. Any floating, suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	☐Yes X☐**No**
4. Location of the receiving water monitoring.	☐Clearwater River, upstream of & adjacent to the stilling basin overflow
5. If the facility has an **OLSB(s)**, is it discharging?	X☐**Yes** ☐No
Photo (s) of OLSB discharges	See Photo Log

Photo (s) of receiving water(s), particularly documenting any of below:	See Photo Log
1. Any floating solids or visible foam in other than trace amounts?	☐Yes X☐**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	☐Yes X☐**No**
3. Any floating, suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	☐Yes X☐**No**
Flow Measurement Device:	
1. Were flow measurements taken during inspection?	☐Yes X☐**No**
Photo (s) of taking flow measurement:	
2. Location of flow measuring device for raceways:	☐ Influent Head Box X☐ **Raceway or Tailrace Effluent** ☐ Other _____
3. How are flow measurements taken?	X☐**Across a dam board** ☐Contracted rectangular weir ☐Other weir _____ ☐Other _____
4. Location of flow measuring device for OLSBs:	☐ Effluent Box ☐ Effluent Pipe ☐ QZ cleaning time X☐ **Across a dam board**
5. How are flow measurements taken?	X☐**Across a dam board** ☐V-Notched weir ☐Other weir _____ ☐Other _____
Sampling:	
1. Are influent sample locations adequate?	X☐**Yes** ☐No

2. Are effluent sample locations adequate?	X☐**Yes** ☐No
3. Are samples refrigerated / iced down after sampling?	X☐**Yes** ☐No
4. Are samples iced down during transportation to contract Lab?	X☐**Yes** ☐No
Solids Containment and Storage	
1. Is the solids disposal area adequate?	☐**N/A**: very large old mill pond is used for settling. Never been de-sludged.
2. Removed solids prevented from reentry to navigable waters?	☐Yes X☐**N/A**
3. Does the facility land apply solids or irrigate with or apply wastewater?	☐Yes X☐**N/A**
Inspection Conclusion Data Sheet (ICDS) information	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	X☐**Yes** ☐No
2. If so, did you communicate them to the facility during the inspection?	X☐**Yes** ☐No
3. Did the facility or operator take any corrective actions	X☐**Yes** ☐No
4. Did you provide general compliance assistance during the inspections?	X☐**Yes** ☐No
5. Did you provide site-specific compliance assistance?	X☐**Yes** ☐No

AREAS OF CONCERN:	QAP does not include training records as required by permit. Very large old mill pond (basically a swamp) used for settling has natural algal growth and other aquatic plants that contribute to effluent suspended solids casing facility to appear to not meet % removal for ss. Discuss with facility staff the possibility of construction of an actual settling pond upstream of swamp and performing monitoring at discharge of newly constructed pond to help meet % removal.

Photographic Documentation

Name of Facility: Kooskia National Fish hatchery

Inspector(s): Mike Piechowski

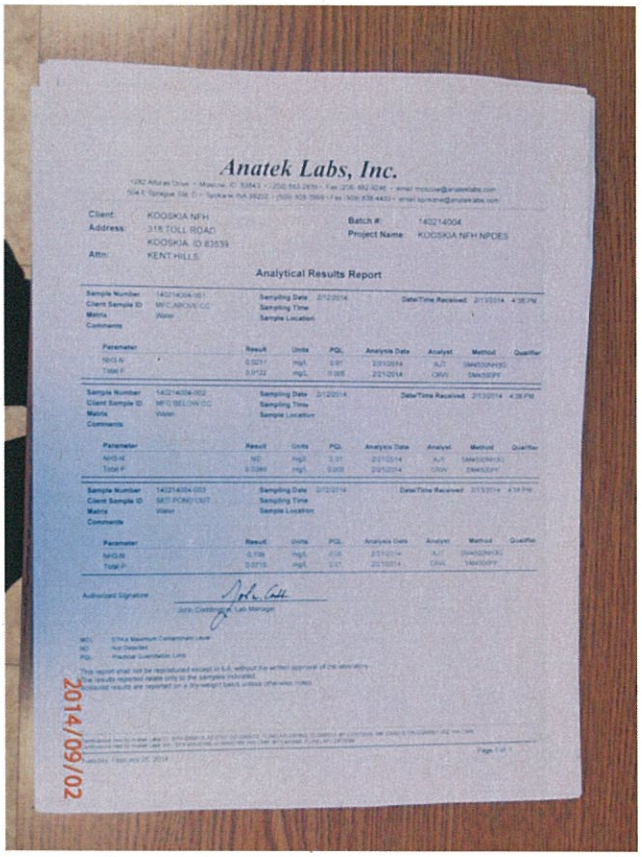
Inspection Date: Tuesday, September 02, 2014

Purpose of Inspection: NPDES Compliance

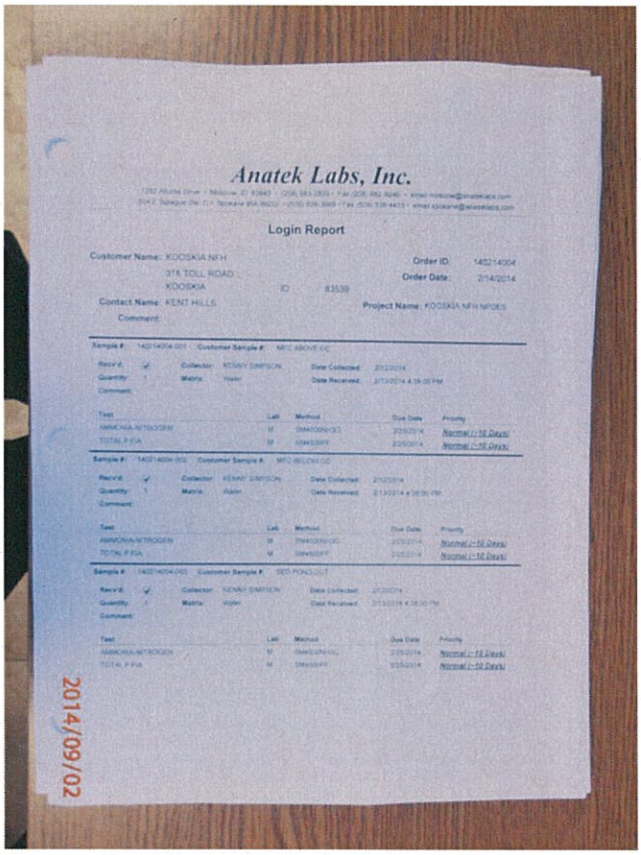
Publish Date: Saturday 13 September 2014

Table of Photographs:

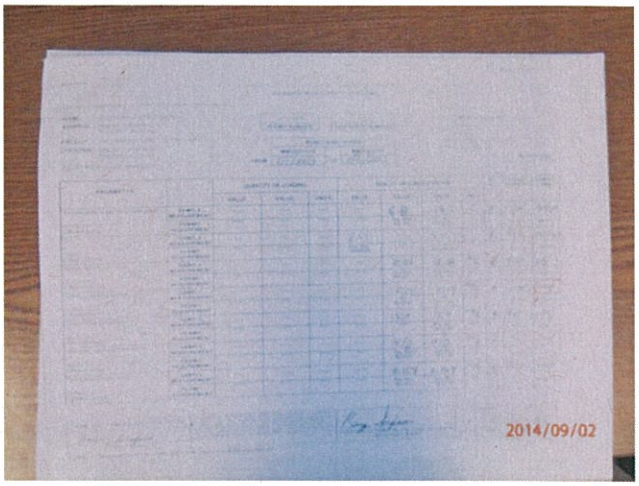
1. Photograph 1: Satellite view with pond to north



2. Photograph 2: Analytical results

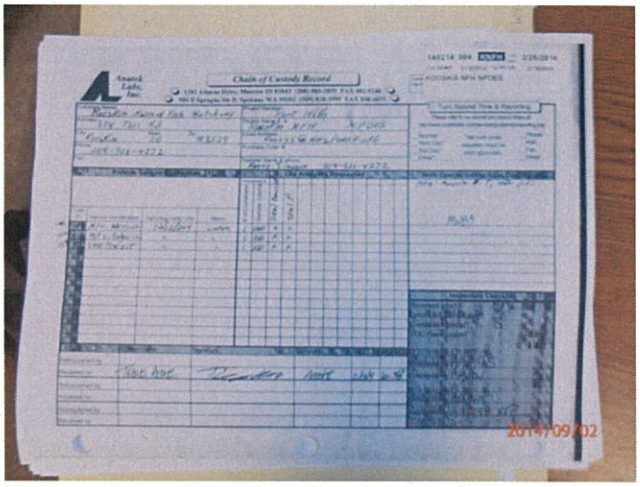


3. Photograph 3: Analytical results

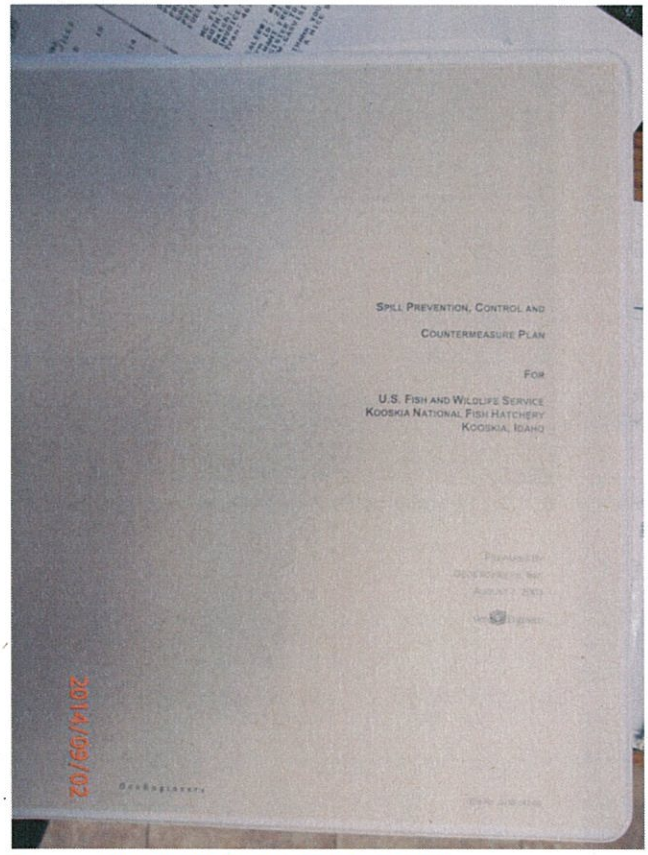


4. Photograph 4: DMR

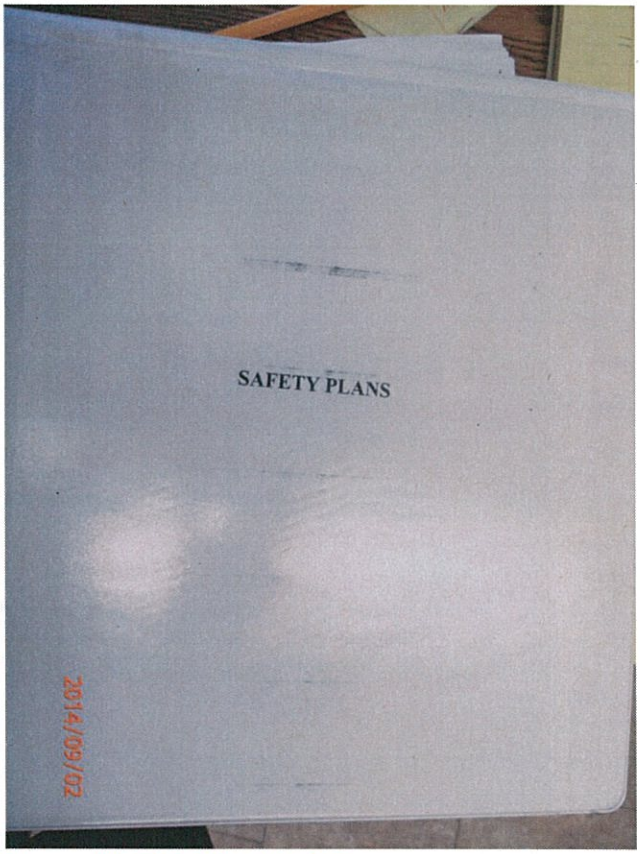
5. Photograph 5: Facility records



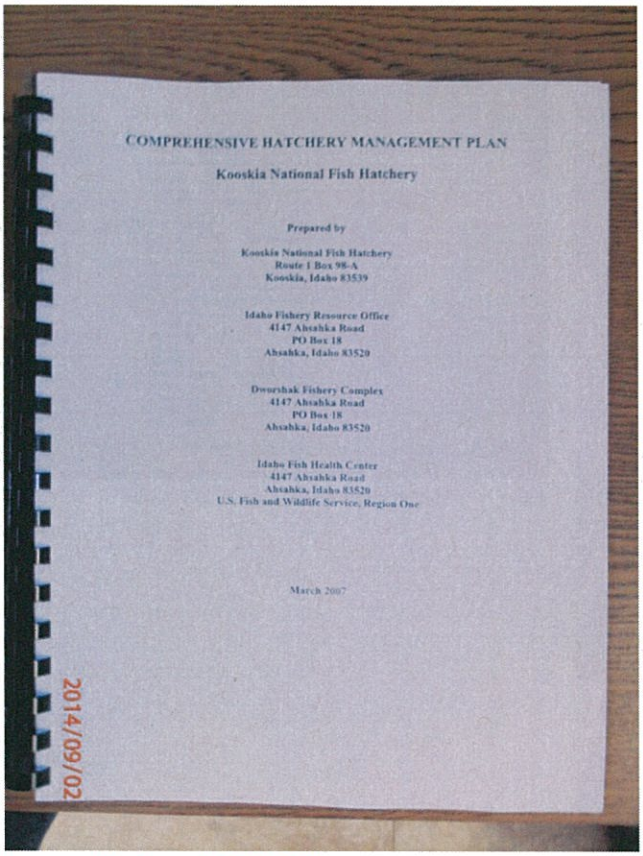
6. Photograph 6: Chain of custody forms



7. Photograph 7: Spill prevention plan



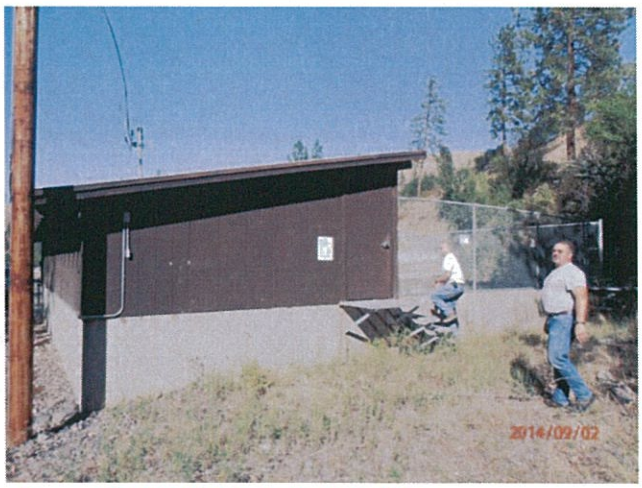
8. Photograph 8: Safety plan



9. Photograph 9: O&M Plan

10. Photograph 10: Water screening and treatment building

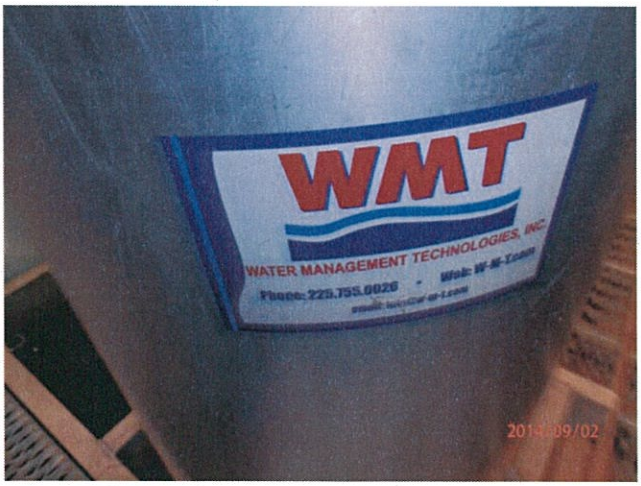
11. Photograph 11: Clear Creek intake



12. Photograph 12: Treatment building

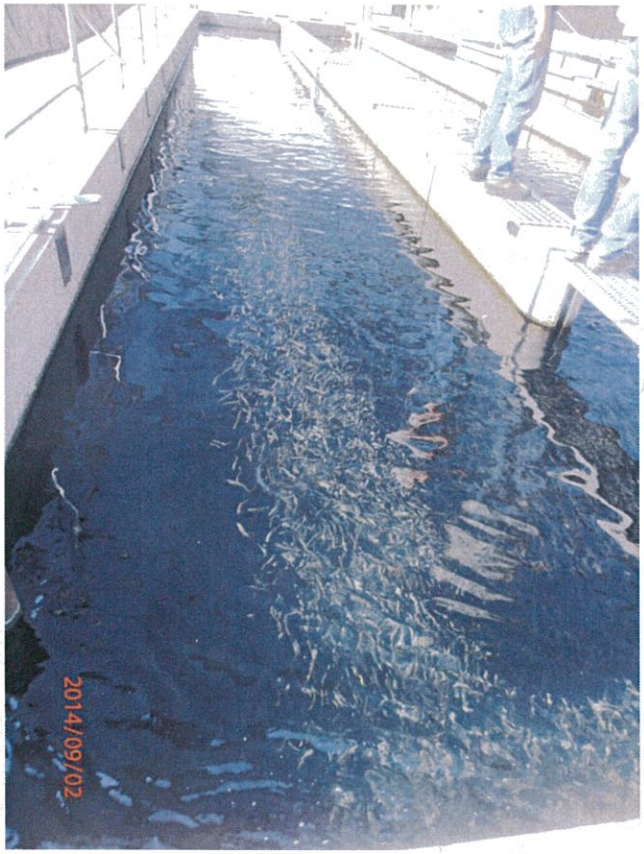
13. Photograph 13: Screen in treatment building

14. Photograph 14: Aerators

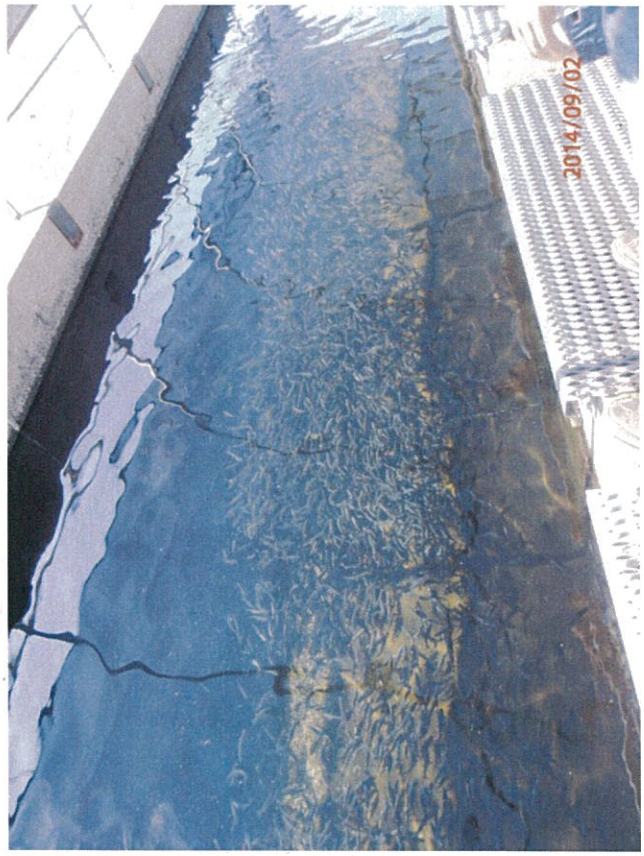


15. Photograph 15: Treatment label

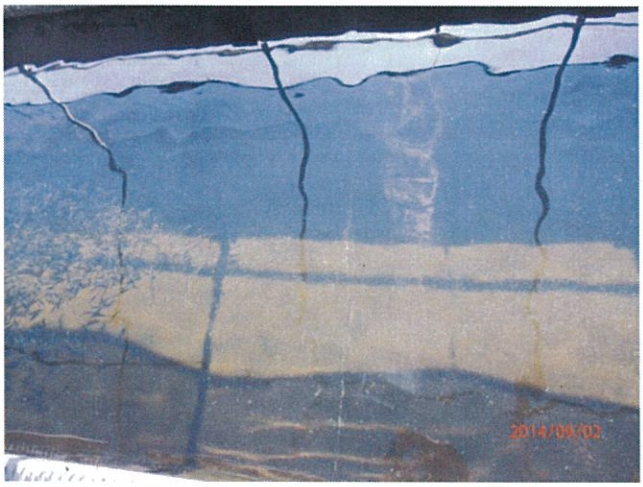
16. Photograph 16: Treated water to hatchery



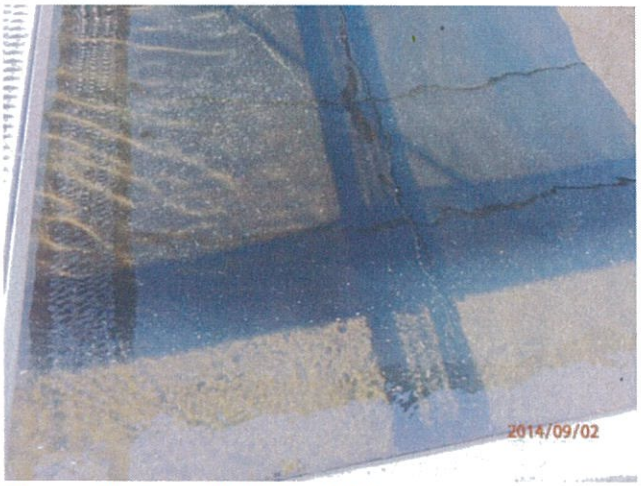
17. Photograph 17: Raceway with smolts



18. Photograph 18: Raceway with smolts

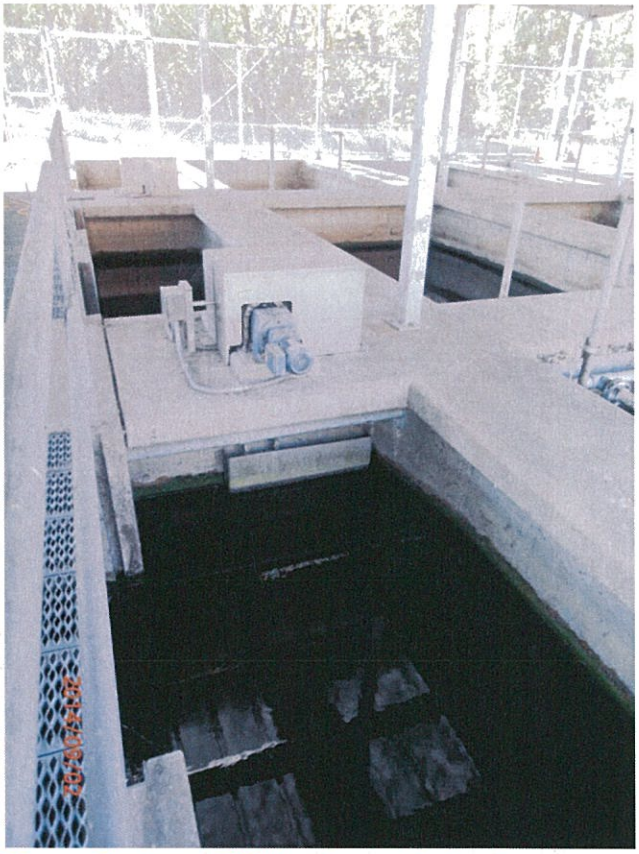


19. Photograph 19: Raceway showing slight solids



20. Photograph 20: Slight solids in raceway

21. Photograph 21: Raceway covers



22. Photograph 22: GW water reuse treatment area

23. Photograph 23: GW water treatment area

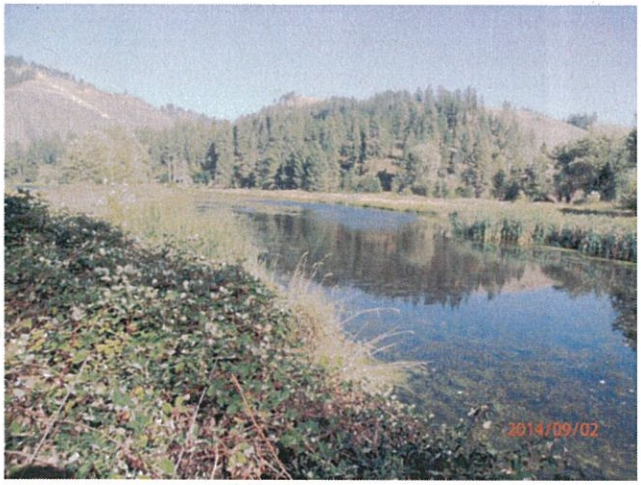
24. Photograph 24: Water treatment

25. Photograph 25: Unused raceways

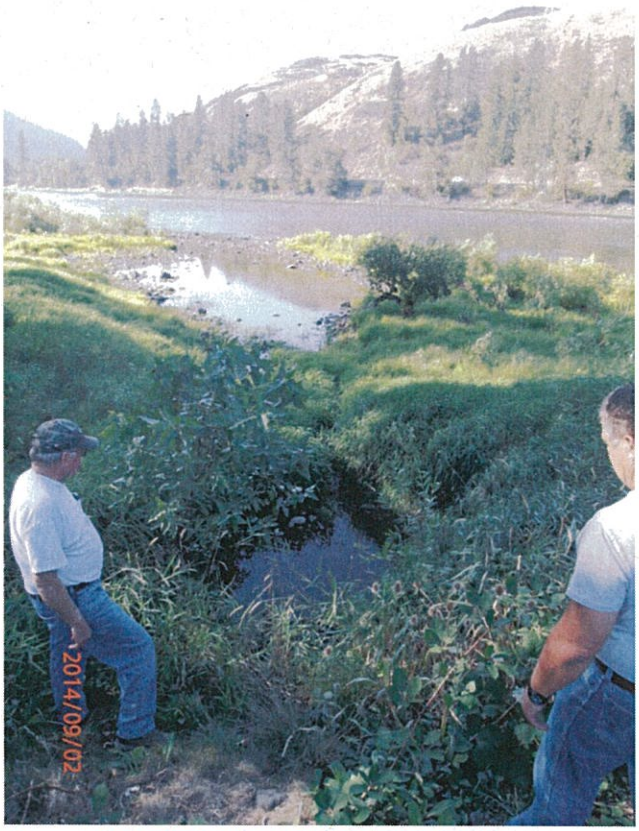
26. Photograph 26: Control boxes. Pond is at far background.

27. Photograph 27: Clear creek adjacent to hatchery

28. Photograph 28: Settling pond outfall

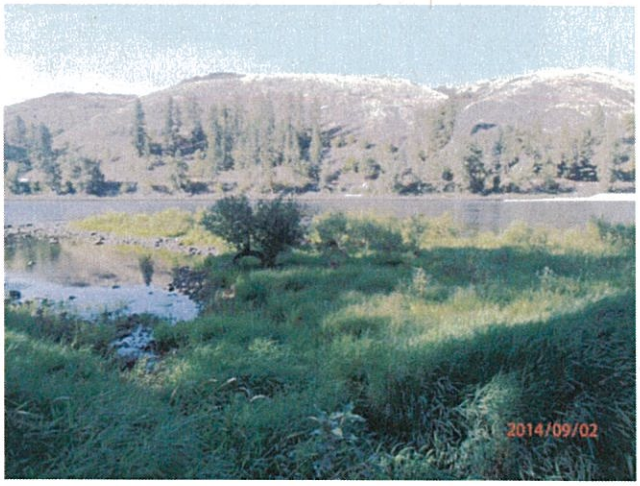


29. Photograph 29: Pond looking toward inlet



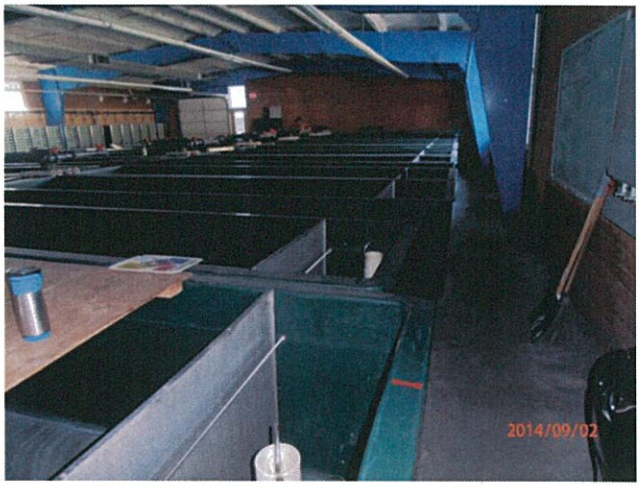
30. Photograph 30: Outfall to Clearwater River

31. Photograph 31: Outfall pipe



32. Photograph 32: View toward upstream monitoring location

33. Photograph 33: Hatchery Building



34. Photograph 34: Hatchery Building